

St. Bernard Asset Management, Inc.

Business Continuity Plan 12/31/2023

I. Emergency Contact Persons

Our firm's two emergency contact persons are: Robert Keenan, CEO, 479-967-1200, 479-264-2114, Robert.Keenan@stbernardfinancial.com and Debra Wells, Director of Business Operations, 479-219-5238, Debra.Wells@stbernardfinancial.com. These names will be updated in the event of a material change, and our Executive Representative will review them within 17 business days of the end of each quarter.

Rule: FINRA Rule 3520.

II. Firm Policy

Our firm's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm's books and records, and allowing our customers to transact business. In the event that we determine we are unable to continue our business, we will assure customers prompt access to their funds and securities.

A. Significant Business Disruptions (SBDs)

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our firm's ability to communicate and do business, such as a fire in our building. In this event we can communicate with our vendors and clients from telephones at another location. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, or a wide-scale, regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of our clearing firm.

B. Approval and Execution Authority

Robert Keenan, CEO, a registered principal, is responsible for approving the plan and for conducting the required annual review. Robert Keenan, CEO has the authority to execute this BCP.

C. Plan Location and Access

Our firm will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. An electronic copy of our plan is located on

Robert Keenan's Laptop, in Robert Keenan's computer at work under My Documents – Business Continuity Plan, in stand alone backup hard drives stored in a fire proof safe on premises, and in the company's Corporate Manual.

III. Business Description

Our firm conducts business in equity and fixed income securities, mutual funds, and fee based asset management. Our firm is an introducing firm and does not perform any type of clearing function for itself or others. Furthermore, we do not hold customer funds or securities. We accept and enter orders. All equity and bond transactions are sent to our clearing firm, which executes our orders, compares them, allocates them, clears and settles them. Our clearing firm also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities. Our firm services only retail customers. We do not engage in any private placements nor market making.

Our clearing firm is TradePMR. Their office is at 2511 NW 41st St., Gainesville, FL 32635.

IV. Office Locations

St Bernard is headquartered in Russellville, AR. Our main office is located at 1609 West Main St, Russellville, AR 72801. Its main telephone number is 479-967-1200. Our employees may travel to that office by means of foot or car. We engage in order taking and entry at this location.

V. Alternative Physical Location(s) of Employees

In the event of an SBD, we will move our staff from affected offices to the closest of our unaffected office locations. If none of our other office locations is available to receive those staff, we will move them to the home of the CEO, Robert Keenan. Its main telephone number is 479-264-2114.

Rule: *FINRA Rule 3510(c)(6).*

VI. Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities, which are maintained at our clearing firm, TradePMR. In the event of an internal or external SBD, if telephone service is available, our registered persons will take customer orders or instructions and contact our clearing firm on their behalf, and if our Web access is available, our firm will post on our Web site that customers may access their funds and securities by contacting TradePMR at 888-723-3767. The firm will make this information available to customers through its disclosure policy.

VII. Data Back-Up and Recovery (Hard Copy and Electronic)

Our firm maintains its primary hard copy books and records and its electronic records at 1609 West Main St. Russellville, AR. Robert Keenan, CEO is responsible for the maintenance of these books and records. Our firm maintains the following document types and forms that are not transmitted to our clearing firm: Client Profiles, Client account applications, and Rep records. All of these documents are in Microsoft formats and stored as paper copies.

Our firm maintains its back-up books and records at 16412 Hwy 155 North, Dardanelle AR 72834. These records are in electronic format. Robert Keenan, CEO is responsible for the maintenance of these back-up books and records. The firm backs up its electronic records weekly and keeps a copy at Dardanelle address.

In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover them from our vendors. If our primary site is inoperable, we will continue operations from our back-up site or an alternate location. For the loss of electronic records, we will either physically recover the storage media or electronically recover data from our back-up site, or, if our primary site is inoperable, continue operations from our back-up site or an alternate location.

Rule: *FINRA Rule 3510(c)(1).*

VIII. Financial and Operational Assessments

A. Operational Risk

In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, critical banks, critical counter-parties, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include our Website (StBernardFinancial.com), telephone voice mail, and cell phones. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

Rules: *FINRA Rules 3510(c)(3) & (f)(2).*

B. Financial and Credit Risk

In the event of an SBD, we will determine the value and liquidity of our investments and other assets to evaluate our ability to continue to fund our operations and remain in capital compliance. We will contact our clearing firm, critical banks, and investors to apprise them of our financial status. If we determine that we may be unable to meet our

obligations to those counter-parties or otherwise continue to fund our operations, we will request additional financing from our bank or other credit sources to fulfill our obligations to our customers and clients. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take appropriate steps, including borrowing from family.

Rules: *FINRA Rules 3510(c)(3), (c)(8) & (f)(2).*

IX. Mission Critical Systems

Our firm's "mission critical systems" are those that ensure prompt and accurate processing of securities transactions, including order taking, entry, execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities. More specifically, these systems include: telephone lines with Cingular Telecom and computer linked internet access with Cingular Telecom.

We have primary responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions of order taking and entry. Our clearing firm provides, through contract, the execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities.

Our clearing firm contract provides that our clearing firm will maintain a business continuity plan and the capacity to execute that plan. Our clearing firm represents that it will advise us of any material changes to its plan that might affect our ability to maintain our business and has presented us with an executive summary of its plan. In the event our clearing firm executes its plan, it represents that it will notify us of such execution and provide us equal access to services as its other customers. If we reasonably determine that our clearing firm has not or cannot put its plan in place quickly enough to meet our needs, or is otherwise unable to provide access to such services, our clearing firm represents that it will assist us in seeking services from an alternative source.

Our clearing firm represents that it backs up our records at a remote site. Our clearing firm represents that it operates a back-up operating facility in a geographically separate area with the capability to conduct the same volume of business as its primary site. Our clearing firm has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing.

Recovery-time objectives provide concrete goals to plan for and test against. They are not, however, hard and fast deadlines that must be met in every emergency situation, and various external factors surrounding a disruption, such as time of day, scope of disruption, and status of critical infrastructure—particularly telecommunications—can affect actual recovery times. Recovery refers to the restoration of clearing and settlement activities after a wide-scale disruption; resumption refers to the capacity to accept and

process new transactions and payments after a wide-scale disruption. Our clearing firm has the following SBD recovery time and resumption objectives: recovery time period of within 24 hours; and resumption time of the same business day.

A. Our Firm's Mission Critical Systems

1. Order Taking

Currently, our firm receives orders from customers via telephone or in personal visits by the customer. During an SBD, either internal or external, we will continue to take orders through any of these methods that are available and reliable, and in addition, as communications permit, we will inform our customers when communications become available to tell them what alternatives they have to send their orders to us. Customers will be informed of alternatives by our Website or by telephone. If necessary, we will advise our customers to place orders directly with our clearing firm at 888-723-3767.

2. Order Entry

Currently, our firm enters orders by recording them on paper and electronically and sending them to our clearing firm electronically or telephonically. Alternatively, We place customer orders through direct calling to First Southwest.

In the event of an internal SBD, we will enter and send records to our clearing firm by the fastest alternative means available, which include e-mail, fax, and/or telephone. In the event of an external SBD, we will maintain the order in electronic or paper format, and deliver the order to the clearing firm by the fastest means available when it resumes operations. In addition, during an internal SBD, we may need to refer our customers to deal directly with our clearing firm for order entry.

3. Order Execution

We currently execute orders by telephone or electronically for equities and bonds and application direct for all other securities. In the event of an internal SBD, we would continue at our alternate location. In the event of an external SBD, we would communicate with First Southwest direct.

B. Mission Critical Systems Provided by Our Clearing Firm

Our firm relies, by contract, on our clearing firm to provide order execution, order comparison, order allocation, and the maintenance of customer accounts, delivery of funds and securities, and access to customer accounts. They have backup systems in place to be able to perform these functions.

C. Mission Critical Services Provided by Senior Management

In the event of incapacitation of Robert Keenan, our current CEO, Muni Principal, and FINOP there are adequate personnel to replace him. For sales supervision role, Sharon Dyer CRD# 1456415 holds the appropriate Series 24, 28, 53 license and has 28 years of experience. Both are aware of their duties in this. In the event of Keenan's incapacitation, clients will be notified within 5 days of the change in the firm's supervision. Debra Wells will supervise the notification.

Rules: FINRA Rules 3510(c) & (f)(1).

X. Alternate Communications Between the Firm and Customers, Employees, and Regulators

A. Customers

We now communicate with our customers using the telephone, e-mail, our Web site, fax, U.S. mail, and in person visits at our firm or at the other's location. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. For example, if we have communicated with a party by e-mail but the Internet is unavailable, we will call them on the telephone and follow up where a record is needed with paper copy in the U.S. mail.

Rule: FINRA Rule 3510(c)(4).

B. Employees

We now communicate with our employees using the telephone, e-mail, and in person. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. Our Website is available to facilitate communications with our employees.

Rule: FINRA Rule 3510(c)(5).

C. Regulators

We are currently members of the FINRA. We communicate with our regulators using the telephone, fax, U.S. mail, and in person. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party.

Rule: FINRA Rule 3510(c)(9).

XI. Critical Business Constituents, Banks, and Counter-Parties

A. Business Constituents

We have contacted our critical business constituents (businesses with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing us critical services), and determined the extent to which we can continue our business relationship with them in light of the internal or external SBD. We will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because of a SBD to them or our firm. Our major suppliers are: First Southwest and the various mutual fund vendors listed on our vendor list.

Rules: *FINRA Rule 3510(c)(7).*

B. Banks

We have contacted our banks and lenders to determine if they can continue to provide the financing that we will need in light of the internal or external SBD. The bank maintaining our operating account is: Bank OZK 450 West Main Russellville, AR 479-498-2265.

Rules: *FINRA Rule 3510(c)(7).*

C. Counter-Parties

We have contacted our critical counter-parties, such as other broker-dealers or institutional customers, to determine if we will be able to carry out our transactions with them in light of the internal or external SBD. Where the transactions cannot be completed, we will work with our clearing firm or contact those counter-parties directly to make alternative arrangements to complete those transactions as soon as possible.

Rules: *FINRA Rules 3510(a) &(c)(7).*

XII. Regulatory Reporting

Our firm is subject to regulation by: SEC, Arkansas Securities Department, MSRB, and SIPC. We now file reports with our regulators electronically using fax, e-mail, and the Internet. In the event of an SBD, we will check with the SEC, FINRA, and other regulators to determine which means of filing are still available to us, and use the means closest in speed and form (written or oral) to our previous filing method. In the event that we cannot contact our regulators, we will continue to file required reports using the communication means available to us.

Rule: *FINRA Rule 3510(c)(8).*

XIII. Disclosure of Business Continuity Plan

We provide in writing a BCP disclosure statement to customers at their request.
Our disclosure statement is attached.

Rule: FINRA Rule 3510(e).

XIV. Updates and Annual Review

Our firm will update this plan whenever we have a material change to our operations, structure, business or location or to those of our clearing firm. In addition, our firm will review this BCP annually, in January of each year, to modify it for any changes in our operations, structure, business, or location or those of our clearing firm.

Rule: FINRA Rule 3510(b).

XV. Senior Manager Approval

I have approved this Business Continuity Plan as reasonably designed to enable our firm to meet its obligations to customers in the event of an SBD.

Rule: FINRA Rule 3510(d).

Signed: _____

Title: _____

Date: _____